

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ABC CORPORATION I,
ABC CORPORATION II,

Plaintiffs,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendants.

Case No. 1:20-cv-4806

Judge Thomas M. Durkin

Magistrate Judge Jeffrey Cole

DECLARATION OF CHANDLER E. STURM

I, Chandler E. Sturm, hereby declare as follows:

1. I am an attorney at Tarter, Krinsky & Drogin LLP, counsel of record for Plaintiffs Hangzhou Chic Intelligent Technology Co., Ltd. (“Chic”) and Unicorn Global, Inc. (“Unicorn”, and collectively with Chic, “Plaintiffs”).
2. I make this Declaration in support of Plaintiffs’ Opposition to Defendants’ Motion to Strike Plaintiffs’ Expert Report.
3. Attached hereto as **Exhibit A** is a true and correct copy of the Expert Report of Paul Hatch served on Defendants during expert discovery on August 15, 2022.
4. Attached hereto as **Exhibit B** is a true and correct copy of the Paul Hatch Rebuttal Report to Jim Gandy Expert Report served on Defendants during expert discovery on September 12, 2022.

5. Attached hereto as **Exhibit C** is a true and correct copy of the Paul Hatch Rebuttal Report to Lance Rake Expert Report served on Defendants during expert discovery on September 12, 2022.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 22, 2023
New York, New York

By: *Chandler Elizabeth Sturm*
Chandler E. Sturm